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19 *Attorneys for Plaintiff and Counter Defendants*

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 CHEMEON SURFACE TECHNOLOGY, LLC, a  
23 Nevada limited liability company,

24 Plaintiff,

25 v.

26 METALAST INTERNATIONAL, INC., a Nevada  
27 corporation; METALAST, INC., a Nevada  
corporation; SIERRA DORADO, INC., a Nevada  
corporation; DAVID M. SEMAS, an individual;  
28 GREG D. SEMAS, an individual; and WENDI  
SEMAS-FAURIA, an individual.

29 Defendants.

30 Case No.: 3:15-cv-00294-MMD-VPC

31 **STIPULATION and [PROPOSED]  
32 ORDER TO EXTEND DEADLINE TO  
33 FILE PROPOSED JOINT PRETRIAL  
34 ORDER  
35 [FIRST REQUEST]**

36 DAVID M. SEMAS; and METALAST  
37 INTERNATIONAL, INC.,

38 Counterclaimants,

39 v.

40 CHEMEON SURFACE TECHNOLOGY, LLC,  
41 DEAN S. MEILING; and MADYLON  
42 MEILING,

1 Counter Defendants.  
2 CHEMEON SURFACE TECHNOLOGY, LLC, a  
3 Nevada limited liability company,  
4 Plaintiff,  
5 v.  
6 MHA GROUP, a company; and MARC HARRIS,  
7 an individual.  
8 Defendants.

Consolidated with:  
Case No. 3:15-cv-00295-MMD-VPC

9 Plaintiff/Counter Defendants CHEMEON Surface Technology and Counter Defendants  
10 Dean S. Meiling and Madylon Meiling (collectively “CHEMEON”), by and through their  
11 undersigned counsel, Robert C. Ryan of Holland & Hart, LLP; Defendants Metalast International,  
12 Inc., Metalast, Inc., Sierra Dorado, Inc., David M. Semas, and Counterclaimants Metalast  
13 International, Inc. and David M. Semas (collectively “Metalast Defendants”), by and through their  
14 undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate and agree  
15 as follows:

16 1. On April 2, 2018, the Court entered its Minute Order In Chambers (ECF No. 400)  
17 directing the Proposed Joint Pretrial Order to be filed within 60 days.  
18 2. Pursuant to the Minute Order, the Proposed Joint Pretrial Order is due June 1,  
19 2018.

20 3. Currently still pending before the Court are the following briefs and motions:  
21 a. supplemental briefing by the parties on the cancellation claim/fraudulent  
22 renewal at ECF Nos. 354, 356, and 404 and 405; and  
23 b. motion for reconsideration briefing by the parties at ECF Nos. 412, 413,  
24 and 417.

25 4. The parties agree to extend the deadline within which to file the Proposed Joint  
26 Pretrial Order to 30 days after the Court enters its rulings on the pending matters identified in  
27 paragraph 3 above.

28 5. This extension is agreed to and requested based on the Court’s response to the

1 parties' joint inquiry to the Court concerning the deadline to file the Proposed Joint Pretrial Order.

2       6. This is the first request for an extension of time to file the Proposed Joint Pretrial  
3 Order.

4       7. This request for an extension is made in good faith and not for purposes of delay.  
5

6           IT IS SO STIPULATED.

7 DATED this 17th day of May, 2018.

8 HOLLAND & HART LLP

9       /s/ Tamara Reid  
10 Robert C. Ryan (7164)  
11 Timothy A. Lukas (#4678)  
12 Tamara Reid (9840)  
13 5441 Kietzke Lane, Second Floor  
14 Reno, Nevada 89511  
15 Attorneys for Chemeon Surface Technology,  
16 LLC, Dean S. Meiling, and Madylon Meiling

DATED this 17th day of May, 2018.

HOY CHRISSINGER KIMMEL PC

17       /s/ Michael D. Hoy  
18 Michael D. Hoy (2723)  
19 Bank of America Tower  
20 50 West Liberty Street, Suite 840  
21 Reno, Nevada 89501  
22 Telephone: (775) 786-8000  
23 Facsimile: (775) 786-7426  
24 Attorneys for Metalast International, Inc.,  
25 Metalast, Inc., Sierra Dorado, Inc., David M.  
26 Semas, Greg D. Semas, and Wendi Semas-  
27 Fauria

28           IT IS SO ORDERED.  
  
UNITED STATES DISTRICT JUDGE

DATED: May 17, 2018

1  
PROOF OF SERVICE

2 Pursuant to FRCP 5, I, declare, as follows:

3 I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices  
4 of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada  
5 89511. I am over the age of 18 years and not a party to this action.

6 I am readily familiar with Holland & Hart's practice for collection and processing of:  
7 HAND DELIVERIES, FACSIMILES and OUTGOING MAIL. Such practice in the ordinary  
course of business provides for the delivery or faxing and/or mailing with the United States Postal  
Service, to occur on the same day the document is collected and processed.

8 On May 17, 2018, I served the foregoing, **STIPULATION and [PROPOSED] ORDER**  
9 **TO EXTEND DEADLINE TO FILE PROPOSED JOINT PRETRIAL ORDER [FIRST**  
**REQUEST]**, as follows:

- 10  **ELECTRONIC:** by electronic transmission through the United States District Court's  
11 CM/ECF system to the parties below:

12 Michael D. Hoy  
13 HOY CRISSINGER KIMMEL  
14 Bank of America Tower  
15 50 West Liberty Street, Suite 840  
16 Reno, Nevada 89501  
17 Telephone: (775) 786-8000  
18 Facsimile: (775) 786-7426  
19 [mhoy@nevadalaw.com](mailto:mhoy@nevadalaw.com)

20 *Attorneys for Defendants*

- 21  **U.S. MAIL:** by placing a true copy thereof in Holland & Hart's outgoing mail in a sealed  
22 envelope addressed as follows:

23 Marc Harris  
24 2471 Morning Dew Drive  
25 Brea, CA 92821  
26 Telephone: 714-642-1021  
27 Email: [Marcharr3@hotmail.com](mailto:Marcharr3@hotmail.com)

28 I declare under penalty of perjury under the laws of the United States of America that the  
foregoing is true and correct, and that this declaration was executed on May 17, 2018.

29 /s/ Jeanette Sparks  
30